

**COMMONWEALTH OF MASSACHUSETTS  
BEFORE THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

\_\_\_\_\_)  
**Boston Gas Company d/b/a  
KeySpan Energy Delivery New England**  
\_\_\_\_\_)

**D.T.E. 03-40**

**PETITION TO INTERVENE  
ON BEHALF OF  
ASSOCIATED INDUSTRIES OF MASSACHUSETTS**

Associated Industries of Massachusetts (A.I.M.) hereby petitions for leave to intervene and participate in the above captioned proceeding.

In support of its request, A.I.M. states the following:

1. Petitioner is an organization of Massachusetts companies representing more than 7,500 employers in both the manufacturing and non-manufacturing sectors in the Commonwealth. A.I.M. was founded in 1915 and has since sought to advocate positive public policy decisions to promote a vibrant and expanding economy, and retain and expand job opportunities in Massachusetts.
2. In conducting adjudicatory hearings, the Department may “allow any person showing that he may substantially and specifically affected by the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any limited purpose” as the Department may order. *See* G.L. c. 30A section 10, cl. (4); *see, also*, 220 CMR 1.036(1)(b). A.I.M. has participated in similar D.T.E. proceedings.
3. Petitioner is responsible for representing the interests of its commercial and industrial members across the Commonwealth in various forums. A.I.M. members in the KeySpan distribution territory will be substantially affected by the increase proposed in this performance-based rate plan, and members outside of the distribution territory will be affected by potentially precedent setting decisions made by the Department in this case.

4. A.I.M. represents specific classes of ratepayers and is qualified to represent their interests and determine if, as customer class, they will be harmed by proposed cost allocation or other proposed changes in this case.
5. A.I.M. requests that all notices, testimony, pleadings and correspondence pertaining to these proceedings be directed to:

Angela M. O'Connor  
Vice President - Energy Programs  
Associated Industries of Massachusetts  
222 Berkeley Street, 13<sup>th</sup> Floor  
Boston, MA 02117-0763

Therefore, A.I.M. respectfully requests the right to participate in this proceeding as a full intervener.

RESPECTFULLY SUBMITTED

By: 

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Angela M. O'Connor  
Vice President – Energy Programs  
Associated Industries of Massachusetts  
222 Berkeley Street, 13<sup>th</sup> Floor  
Boston, MA 02117-0763

Date: May 12, 2003